

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, ET AL.,

Plaintiffs,

vs.

BRIAN KEMP, ET AL.,

Defendants.

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CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

**PLAINTIFF COALITION FOR GOOD GOVERNANCE’S MOTION
FOR EXPANSION OF TIME TO FILE *EX PARTE* RESPONSE TO
STEPTOE & JOHNSON LLP’S MOTION TO WITHDRAW**

The Coalition for Good Governance (“CGG”) respectfully moves the Court to grant an expansion of time until 5:00 p.m. on November 28, 2017 to file CGG’s Response to Steptoe & Johnson LLP’s Motion to Withdraw. [Docket Entry 104].

On November 15, 2017 the Court ordered CGG to file its Response *ex parte* with the Clerk on November 27, 2017. [Docket Entry 110]. Thereafter, CGG retained the undersigned counsel for the limited purpose of litigating issues related to the withdrawal and/or disqualification of Steptoe & Johnson LLP as counsel and any ancillary urgent matters until such time as CCG is able to retain new counsel to represent it on the merits. On November 27, 2017, immediately before printing and delivering to the Clerk of the Court an extensive Response Brief containing

relevant exhibits, undersigned counsel was informed by Steptoe that Steptoe would voluntarily seek this Court's permission to withdraw from all representation in the case.

This last-minute unanticipated development from Steptoe regarding legal issues central to the CGG Response created the need to make significant changes in documentation that had been readied for filing. Undersigned counsel had a required court appearance this afternoon, making it impossible to make the appropriate modifications to the Response Brief and physically deliver the paper document to the Clerk of the Court for timely *ex parte* filing before the close of the business today. Therefore, CGG seeks an expansion of time of one business day, until 5:00 p.m. November 28, 2017 for its *ex parte* filing of the referenced Response.

Dated: November 27, 2017

Respectfully submitted,

/s/ William Brent Ney
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Attorney for Coalition
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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1

The above counsel hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.

CERTIFICATE OF SERVICE

This is to certify that I have this day caused the within and foregoing
“**Notice of Limited Scope Appearance**” to be served upon all other parties in this
action by electronic service via to be served via electronic delivery using the
PACER-ECF system as authorized by LR 5.0(A), NDGA upon the following:

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Dated: November 27, 2017

Respectfully submitted,

/s/ William Brent Ney

WILLIAM BRENT NEY

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